

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

AMAZON.COM, INC., a Delaware corporation; AMAZON.COM SERVICES LLC, a Delaware limited liability company; and AMAZON TECHNOLOGIES, INC., a Nevada Corporation,

Plaintiffs,

v.

DIGITAL HOME SOLUTIONS LLC, a Georgia corporation; JOTI APPLLEE DHILLON, an individual; and DOES 1-50, unknown individuals and entities,

Defendants.

CIVIL ACTION FILE

NO.: 1:23-cv-5175-ELR

**JOINT MOTION AND
STIPULATION FOR
PERMANENT INJUNCTION**

JOINT MOTION AND STIPULATION FOR PERMANENT INJUNCTION

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies, Inc., and Defendants Digital Home Solutions LLC and Joti Applee Dhillon, by and through their respective counsel of record, hereby stipulate and move the Court to enter the permanent injunction below.

Respectfully submitted this 19th day of March, 2024.

DAVIS WRIGHT TREMAINE LLP

LEXERO LLC

/s/ Jaime Drozd

Bonnie E. MacNaughton*

Jaime Drozd*

920 Fifth Avenue, Suite 3300

Seattle, WA 98104

Phone: (206) 622-3150

Fax: (206) 757-7700

bonniemacnaughton@dwt.com

jaimedrozd@dwt.com

**pro hac vice*

/s/ Eric Menhart

Eric Menhart*

512 C. St. NE

Washington, DC 20002

Phone: (855) 453-9376

Fax: (855) 453-9376

eric.menhart@lexero.com

**pro hac vice forthcoming*

Attorney for Defendants

ROBBINS ALLOY BELINFANTE
LITTLEFIELD LLC

/s/ Craig G. Kunkes

Craig G. Kunkes

Georgia Bar No. 963594

Michael D. Forrest

Georgia Bar No. 974300

500 14th Street, NW

Atlanta, Georgia 30318

Phone: (678) 701-9381

ckunkes@robbinsfirm.com

mforrest@robbinsfirm.com

Attorneys for Plaintiffs

ORDER ENTERING PERMANENT INJUNCTION

Pursuant to the above joint motion and stipulation for permanent injunction of the parties, IT IS HEREBY ORDERED that Defendants Joti Applee Dhillon and Digital Home Solutions LLC, and their directors, principals, officers, successors and assigns, and all others in active concert or participation with them, are enjoined and restrained from:

1. Using any trademarks registered by or otherwise associated with Amazon (the “Amazon Trademarks”) or any simulation, reproduction, counterfeit, copy, or colorable imitation of them, in any manner in connection with any advertising, marketing, offer for sale, promotion, display, publication, website, email, or software, without Amazon’s prior written consent (which it has sole discretion to provide or withhold for any reason);
2. Using any false designation of origin or false or misleading description or representation that can or is likely to lead the trade or public or individuals erroneously to believe that any website, email, advertisement, pop-up, or other marketing material has been produced, distributed, displayed, licensed, sponsored, approved or authorized by or for Amazon, when such is not true in fact;
3. Engaging in any other activity constituting an infringement or dilution of any of the Amazon Trademarks, or of Amazon’s rights in, or right to use or to exploit, such trademarks or services marks;
4. Engaging in any other conduct involving the unauthorized use of Amazon Trademarks or other indicia of Amazon’s brand to defraud or otherwise obtain payment from Amazon customers or other members of the public; and
5. Aiding, assisting, or abetting any other person or business entity in engaging in or performing any of the activities listed above.

DATED THIS ____ day of _____, 2024.

The Honorable Eleanor L. Ross
United State District Court,
Northern District of Georgia